

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	Case No. 1:22-cv-1554
Plaintiff,)	
)	Judge Bridget Meehan Brennan
v.)	
)	
KRIS A. SWAFFER, et al,)	
)	
Defendants,)	

DECLARATION OF EDMUND W. SEARBY

Pursuant to 28 U.S.C. §1746, I, Edmund W. Searby, hereby declare and aver as follows:


1. I, together with my law firm, Porter Wright Morris & Arthur, represent defendant Sean Williams in this matter.
2. In response to my question, the Securities and Exchange Commission ("SEC") identified an Assistant United States Attorney in the Western District of Michigan as a contact for a related federal criminal investigation involving Mr. Williams.
3. Last month, I spoke by telephone with the responsible AUSA in the Western District of Michigan who confirmed that Mr. Williams is a "target" of a pending federal criminal investigation.
4. I have contacted the SEC trial attorneys responsible for this action in writing and met and conferred by video conference regarding the stay sought by this

motion. To my understanding, the SEC does not agree to this stay thus necessitating the filing of this motion.

5. During my conversations with the Government regarding the relief sought by this motion, no representation has been made that the criminal and civil matters do not overlap factually.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 19, 2022.



Edmund W. Searby